COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Permittee name – Reynolds Metals
Facility location - Chesterfield County, Virginia
Permit No. PRO50260

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Reynolds Metals Company has applied for a Title V Operating Permit for its Bellwood Printing facility in Chesterfield County. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:

Air Permit Manager:_____ Date:

Deputy Regional Manager:_____ Date:

FACILITY INFORMATION

Permittee
Alcoa Flexible Packaging – Bellwood Printing Plant
2001 Reymet Road
Richmond, VA 23237-3798

Facility
Alcoa Flexible Packaging – Bellwood Printing Plant
2001 Reymet Road
Richmond, VA 23237-3798

County Plant ID No. 51-041-0058

SOURCE DESCRIPTION

SIC Code: 2754 - Commercial Printing, Gravure

Reynolds Metals performs rotogravure printing, laminating and extruding at the Bellwood Printing Plant. The rotogravure printing is performed on paper, board, film and aluminum foil as well as thermal and extrusion laminating for packaging products. Other converting processes handled at the plant are embossing, slitting, die cutting, gluing and etc.

The presses include four board presses and six light web presses. Many of the presses are generally interchangeable as to the product within a category (i.e. board or light web).

The board presses use rolls of paper board and foil stock as feed materials. The light web presses use paper/foil feed stock or film. Most presses have ten printing stations and can print one to seven colors on a single pass. A typical printing press operation would apply water based adhesive (laminate) at station 1, treating solution at station 2, print on stations 3 through 9, and an overcoat at the final station.

Bellwood Printing Plant also operates four extruder/laminator printers which have one or two rotogravure printing stations. The extrusion process is a process where two materials are joined with hot plastic. The plastic, or "poly" material may also be used as a surface coating. A typical application for this equipment would print-paper-poly-foil-poly layers. The three operating laminating lines apply adhesives and/or print.

Adjacent to the Bellwood Printing Plant is the Packaging Technology Center and Packaging Development Center (PTC/PDC). These two buildings and the Bellwood Printing Plant are considered to be a single "facility" as defined in 9 VAC 5-80-30 of the Virginia Air Pollution Regulations. PTC/PDC houses product quality and proofing units which include three printing/laminating units, one

printing/laminating units, one extruder with printing/laminating capabilities, and one paper/film/foil coater/laminator.

The facility is a Title V major source of VOCs and HAPs (Toluene and more). This source is located in an attainment area for all criteria pollutants; however, the source is located in a VOC control area for VOCs. The facility is a PSD major source for VOC. The facility was previously permitted under Minor NSR Permits as listed in the Title V permit and this Statement of Basis.

COMPLIANCE STATUS

The last Partial Compliance Evaluation with a site visit report dated December 6, 2005 for this facility states the source was in compliance. A PCE conducted without a site visit on September 6, 2007 also indicates compliance.

EMISSIONS INVENTORY

The 2006 Emissions Inventory reports from CEDS for criteria pollutants and HAPs have been included on the next page.

Run Date: 09/18/2007 02:47:58 PM

Commonwealth of Virginia
Department of Environmental Quality

Registration Number: 50260

County - Plant ID: 041-00058

Plant Name: Alcoa Flexible Packaging LLC-Bellwood Printing Plt

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Pollutant Type: Hazardous Pollutants

Parameter List

Years: 2006-2007	ETGYL	MTETN	TOLU
2006	2.503	0.182	22.601
Total HAPS: 25.29			

Run Date: 09/18/2007 02:54:38 PM

Commonwealth of Virginia
Department of Environmental Quality

Registration Number: 50260

County - Plant ID: 041-00058

Plant Name: Alcoa Flexible Packaging LLC-Bellwood Printing Plt

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Pollutant Type: Criteria Pollutants

Parameter List

Years: 2006-2007	CO	NH3	NO2	PB	PM 10	PM 2.5	SO2	VOC
2006	2.322	5.868	7.531	0.000	1.027	0.529	12.036	639.087

Applicable Requirements

Emission Unit Applicable Requirements and control device identification

Each of the units listed in the significant emissions units table **(under section II of the Title V permit)** as listed below are regulated in each of the NSR permits as noted in the following table along with the respective RACT agreements. The listing of applicable requirements follows this table:

Emission ID	Stack	Emission Uni Description	Size/Rat Capacit	Pollution Control D (PCD) Descripti	PCD	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
001	1	Boiler (19 Erie Cit SAGOH-A18 #6)	26 Mmbtu/hr input	NA	NA	NA	NA – Grandfathered/Exist ng Source
002	2	Boiler (20 Erie Cit SAGOH-15)	13.3 Mmbtu/ input	NA	NA	NA	NA – Grandfathered Existing Source
003	3	Boiler (21 Erie Cit SAGOH-15)	20.3 Mmbtu/ input	NA	NA	NA	NA – Grandfathered/ Existing Source
Process Equipment							
021	004	Includes Nos. 1, 2, **(only for the treat station)**, 4, 6, 8, 9, 11 Printing Presses Nos. 1, 2, and 3 Extruders; No. 1 Press (max. width: 55") No. 2 Press (max. width: 45") No. 3 Press **(only the treating statio** (max. web width:	850 ft/min 800 ft/min 1,100 ft/min 710 ft/min 800 ft/min 1,000 ft/min	Smith – Thermal Oxidizer with an estimated 70% capt efficiency with an a 94% destruction efficiency. (The Smith thermal oxidizer controls al stations except for t treat station on No. press.)	CD001 CD002	VOC	SIP Consent Order and Agreement (DSI 414-A-86) SIP Consent Order and Agreement (DSE-413-A-86)

		No. 4 Press (max. width: 45”) No. 6 Press (max. width: 42”) No. 8 Press (max. width: 45”) No. 9 Press (max. width: 43”) No. 10 Press (max width: 45”) No. 11 Pr ess (max width: 45”) No. 1 Extruder (m web width: 45”) No. 2 Extruder (m web width: 45”) No. 3 Extruder (m web width: 45”)	620 ft/min 1,000 ft/min 1,000 ft/min 1,010 ft/min 1,025 ft/min 1,000 ft/min				
022	5	No. 5 Extruder (m web width: 72”)	1,000 ft/min	NA	NA	NA	August 5, 2002
023	6	No. 7 Printing Pres (max web width: 5 7/8”)	1,000 ft/min	NA	NA	NA	October 29, 1998
024	7	No. 3 Laminator (r web width: 45”)	1,000 ft/min	NA	NA	NA	SIP Consent Order and Agreement (DSI 413-A-86) SIP Consent Order and Agreement (DSI

							(DSE-414-A-86)
029	12	No. 2 Laminator – Compliant Coating (max. web width:	No speed limitation wh using inks an coatings that contain no V as per Condit No. 7 of the 15, 2002 per	NA	NA	NA	May 15, 2002
030	013	No. 2 Laminator – Noncompliant Coa (Maximum Web W 50”)	1,000 ft/min[1]	Wheelabrader – Th oxidizer with a min destruction efficien 96.5% along with a enclosure for a 100 capture efficency.	CD003	VOC	May 15, 2002
027	10	Lab Press (4 Color Press) (max. web v 14”) Lab Extruder (max width: 24”) Lab Laminator (ma web width: 12”) COMAC (max. we width: 4”)	700 ft/min 700 ft/min 700 ft/min 300 ft/min	NA	NA	NA	May 15, 2002

028	11	Pilot Coater/Lamin (max. web width:	300 ft/min [2]	NA	NA	NA	May 15, 2002
031	14	Metals Edgers Wa Solution, Ink Roor Mixing Losses, Ge Floor & Plant Clea	NA	NA	NA	NA	Grandfathered
032	015	(3) Press Parts Wa Machines, 43 Gall Wash Tank, and (1 Manual Wash Tan with 19.5 sq.ft. op area	1 cycle/hr fo of the (3) Pre Parts Washir Machines wh using a wash solution >4.5 VOC or 3 cy for each of th Press Parts Washing Machines wh using a clean solution of <	Progressive Recove System – Air to Wa Heat Exchanger	CD004-CD006	VOC	May 30, 2001
I01 & I14, I02 – I13,		Aboveground Stor Tanks – ASTs (2) 5,000 gallon ta (Tank ID Nos. 1 a 14) (12) 3,000 gallon t		Each listed tank has submerged fill pipe		VOC	NA

I15 & I16 I18		tanks (Tank ID Nos. 2 – (2) 4,000 gallon ta (Tank ID Nos. 15 , 16) (1) 10,000 gallon t (Tank ID No. 18)					

The applicable requirements from Article 8 (Emission Standards for Fuel Burning Equipment (Rule 4-8)) for the 27 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003 (respectively)).

A. Limitations

1. Emissions from the operation of the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003) shall not exceed the limits specified below:

001 (27 mmbtu/hr)
PM-10
$1.0906(26+13.3+20.3)^{-0.2594}$ = 0.38 lbs/mmbtu

Sulfur Dioxide
2.64 lbs/mmbtu

002 (13.0 mmbtu/hr)
PM-10
$1.0906(26+13.3+20.3)^{-0.2594}$ = 0.38 lbs/mmbtu

Sulfur Dioxide
2.64 lbs/mmbtu

003 (20.0 mmbtu/hr)

PM-10
$1.0906(26+13.3+20.3)^{-0.2594}$ = 0.38 lbs/mmbtu

Sulfur Dioxide
2.64 lbs/mmbtu

(9 VAC 5-40-900, 9 VAC 5-40-930 and 9 VAC 5-80-110)

2. Visible emissions from each of the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003) shall not exceed 20 percent opacity except for one six-minute period in any one hour of not more than 60 percent opacity. Failure to meet the preceding requirements because of the presence of water vapor shall not be a violation of these requirements.

   (9 VAC 5-40-940 and 9 VAC 5-80-110 B. of State Regulations)

Periodic Monitoring for the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003).

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. The information listed below describes the periodic monitoring requirements for all of the applicable fuel burning requirements for significant sources. Conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

Limitation: Emissions from the operation of the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003) shall not exceed the limits specified below:

001 (27 mmbtu/hr)
PM-10
$1.0906(H)^{-0.2594}$ = 0.38 lbs/mmbtu

Total Capacity (H) =26+13.3+20.3

Sulfur Dioxide
2.64 lbs/mmbtu

002 (13 mmbtu/hr)
PM-10

$1.0906(H)^{-0.2594}$ = 0.38 lbs/mmbtu

Total Capacity (H) = 26+13.3+20.3

Sulfur Dioxide
2.64 lbs/mmbtu

003 (20.0 mmbtu/hr)
PM-10
$1.0906(27+13+20)^{-0.2594}$ = 0.38 lbs/mmbtu

Sulfur Dioxide
2.64 lbs/mmbtu

(9 VAC 5-40-900, 9 VAC 5-40-930 and 9 VAC 5-80-110)

Parameter:

A. Ensuring the emission standard for particulate matter for fuel burning equipment installations and fuel burning equipment units are being met.

Fuel burning equipment installations are defined as the following:
Means all fuel burning equipment units within a stationary source in operation prior to October 5, 1979.

The emission ratio (E) equation which applies to the fuel burning equipment installations and units includes the variable (H) for "total capacity" which is defined as the following:

Means with reference to a fuel burning equipment installation, the sum of the rated capacities (expressed as heat input – total gross calorific value of all fuels burned) of all units of the installation which must be operated simultaneously under conditions of 100% use load.

The emission standard for particulate matter includes two standards one for the maximum allowable particulate emissions standard (when operating at rated capacity) and one for the allowable particulate emissions (when operating at less than the rated capacity which is based on the actual heat content).

B. Ensuring the emission standard for sulfur dioxide for fuel burning equipment installations is being met.

Monitoring and Recordkeeping: Monitoring and recordkeeping will be as according to the following:

2. Records shall be maintained of all oils which are burned in the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002, and 003) along with the heat content and sulfur content. A copy of the Purchase Order specification requiring sulfur content $\leq$ 2.4% shall be used to demonstrate compliance with the recordkeeping for sulfur content. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

   (9 VAC 5-170-160, 9 VAC 5-80-110 E. and F. of State Regulations)

3. The heat content of each oil burned in the 27 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003) shall be inserted into one of the following respective equations, unless the heat content of each oil is documented to be above the respective oils listed (i.e. distillate (#1 $\geq$ 134,000 Btu/gal and #2 $\geq$ 138,000 Btu/gal), #4 residual oil $\geq$ 144,000 Btu/gal, #5 residual oil $\geq$ 146,000 Btu/gal and #6 residual oil $\geq$ 150,000 Btu/gal). If the respective oil's heat content is above the previously listed heat contents, it will be presumed the fuel burning equipment is in compliance with the allowable particulate emissions for each fuel burning equipment unit when operating at less than rated capacity as according to 9 VAC 5-40-900 B.2 of the State Regulations:

Distillate fuel oil:
PM_{10} Emission Factor= 2 * lb of PM_{10}/thousand gals x (1 thousand gals/1,000 gal.) = 0.002 lb of PM_{10}/gal

No. 4 fuel oil:
PM_{10} Emission Factor = 7 * lb of PM_{10}/thousand gals x (1 thousand gals/1,000 gal.) = 0.007 lb of PM_{10}/gal

No. 5 fuel oil:
PM_{10} Emission Factor =9.19(%S)+3.22* = A lb of PM_{10}/thousand gals x (1 thousand gals/1,000 gal.) = B lb of PM_{10}/gal

No. 6 fuel oil:
PM_{10} Emission Factor= 10 * lb of PM_{10}/thousand gals x (1 thousand gals/1,000 gal.) = 0.010 lb of PM_{10}/gal

*: Or current EPA, AP-42 emission factor.

Distillate fuel oil:
1 gal/heat content of fuel (MMBtu) X 0.002 lb of PM_{10}/gal = C lb of PM_{10}/MMBtu

No. 4 fuel oil:
1 gal/heat content of fuel (MMBtu) X 0.007 lb of PM_{10}/gal = C lb of PM_{10}/MMBtu

No. 5 fuel oil:
1 gal/heat content of fuel (MMBtu) X B lb of PM_{10}/gal = C lb of PM_{10}/MMBtu

No. 6 fuel oil:
1 gal/heat content of fuel (MMBtu) X 0.010 lb of PM_{10}/gal = C lb of PM_{10}/MMBtu

(9 VAC 5-170-160, 9 VAC 5-80-110 E. and K. of State Regulations)

4. The sulfur content as per supplier certification of each oil burned shall be inserted into one of the following respective equations, unless the sulfur content is ≤ 2.5%:

Distillate fuel oil:

142(%S)* = A lb of SO_2/thousand gals x (1 thousand gals/1,000 gal.) = B lb of SO_2 /gal

No. 4 fuel oil

150 (%S)* = A lb of SO_2/thousand gals x (1 thousand gals/1,000 gal.) = B lb of SO_2/gal

No. 5 or No. 6 fuel oil

157(%S)* = A lb of SO_2/thousand gals x (1 thousand gals/1,000 gal.) = B lb of SO_2/gal

*: Or current EPA, AP-42 emission factor.
(9 VAC 5-170-160, 9 VAC 5-80-110 E. and K. of State Regulations)

5. The heat content of each oil shipment which are burned in the 26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 (emission unit ID#s 001, 002 and 003) and the results from the respective equation from Condition No. 4 shall be inserted into the following equation to determine compliance with the fuel burning SO_2 standard, unless the sulfur content is ≤ 2.5%, it will be presumed to be in compliance:

Distillate or the use of No. 4 or No. 5 or No. 6 fuel oil:

1 gal/heat content of fuel (MMBtu) X B lb of SO_2/gal = C lb of SO_2 /MMBtu

(9 VAC 5-170-160, 9 VAC 5-80-110 E. and K. of State Regulations)

Limitation: Visible emissions from each of the boilers (26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 - emission unit ID#s 001, 002 and 003) shall not exceed 20 percent opacity except for one six-minute period in any one hour of not more than 60 percent opacity. Failure to meet the preceding requirements because of the presence of water vapor shall not be a violation of these requirements. **Parameter:** Ensuring the fuel burning equipment standard for visible emissions (9 VAC 5-40-940) is being met. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

The emissions from each of the boilers (26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 - emission unit ID#s 001, 002, and 003) shall be observed visually at least once each calendar month [except when burning residual (Nos. 4, 5, or 6) oil which shall be increased to weekly evaluations] for at least a brief time period during normal operations to determine if there are normal visible emissions being met (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above normal visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If any boiler(s) (26 mmbtu/hr 19 Erie City Boiler SAGOH-A18 #6, the 13.3 mmbtu/hr 20 Erie City Boiler SAGOH-15 and the 20.3 mmbtu/hr 21 Erie City Boiler SAGOH-15 - emission unit ID#s 001, 002, and 003) is/are not operated during the calendar month, then no visible emission needs to be performed along with records documenting the boiler(s) were not operated during the calendar month.

RACT DSE-413A-86 - The applicable requirements from the RACT (DSE-413A-86) are listed below.

A. Limitations

1. Volatile organic compound emissions from the affected facilities at the Plant* shall be controlled and reduced as outlined in this Order.
   (9 VAC 5-80-110 and Condition 2 of Section E of RACT Order DSE-413A-86)

2. The "Group A Facilities" at the Plant* are: Nos. 1, 2, 4, 6, 8, 9, 10 and 11 Presses. Nos. 1, 2, 3, and 4 Extruders and the treating station for No. 3 Press.
   (9 VAC 5-80-110 and Condition 3 of Section E of RACT Order DSE-413A-86)

3. The reduction in volatile organic compound emissions from the Group A facilities at the Plant* shall not be less than sixty-five (65) percent, by weight on a daily basis over the historical amount of solvent used to apply the same amount of solids.

Across line averaging of emission reductions will be utilized to determine compliance with the specified daily emission reduction requirement.
(9 VAC 5-80-110 and Condition 4 of Section E of RACT Order DSE-413A-86)

4. Compliance with the requirements of Condition 3 and 4 for the Group A facilities will be determined by the use of a "Daily VOC Model". The model will calculate daily emission reductions by comparing actual material used. The model will calculate daily emission by measuring, on a job basis, all VOC bearing materials consumed. Total job VOC usings shall be apportioned to individual days based on production records. The daily historical amount of solvent which would have been used shall be calculated by factors relating the daily amount of applied solids and the historical amount of solvent required to apply a pound of solids. The historical factors and compliance calculations are shown in Attachment A (of RACT DSE-413A-86).

   (9 VAC 5-80-110 and Condition 5 of Section E of RACT Order DSE-413A-86)

5. The Board has determined that RACT for No. 3 Laminator is an emission limit of 2.0 tons per day. Attachment B to this Order (DSE-413A-86) outlines the basis for this determination.
   (9 VAC 5-80-110 and Condition 7 of Section E of RACT Order DSE-413A-86)

   * "Plant" refers to Reynolds Metals Company's – Bellwood Printing Plant in Chesterfield County.

B. Monitoring and Recordkeeping

1. Compliance with the requirements of Condition 3 and 4 for the Group A facilities will be determined by the use of a "Daily VOC Model". The model will calculate daily emission reductions by comparing actual material used. The model will calculate daily emission by measuring, on a job basis, all VOC bearing materials consumed. Total job VOC usings shall be apportioned to individual days based on production records. The daily historical amount of solvent which would have been used shall be calculated by factors relating the daily amount of applied solids and the historical amount of solvent required to apply a pound of solids. The historical factors and compliance calculations are shown in Attachment A (of RACT DSE-413A-86).

   (9 VAC 5-80-110 and Condition 5 of Section E of RACT Order DSE-413A-86)

2. Records consisting of information as to the calculated daily reduction in emissions of volatile organic compounds from the affected facilities, except those emissions treated by add-on control equipment at the Plant,* shall be kept available at the plant* for at least a two** year time period. Reynolds shall provide the Board an exception report at the end of

report at the end of any quarter when the conditions of Section E, Condition 2, 3 and 4 of this Order (DSE-413A-86) are not met.

(9 VAC 5-80-110 and Condition 6 of Section E of DSE-413A-86 RACT)

* "Plant" refers to Reynolds Metals Company's – Bellwood Printing Plant in Chesterfield County.

** For the purpose of Title V compliance, records required by E.6. of Section E of RACT Order DSE-413A-86 shall be kept available at the Bellwood Printing Plant for at least a **five** year time period.

C. Reporting:

1. Records consisting of information as to the calculated daily reduction in emissions of volatile organic compounds from the affected facilities, except those emissions treated by add-on control equipment at the Plant,* shall be kept available at the plant* for at least a two** year time period. **Reynolds shall provide the Board an exception report at the end of any quarter when the conditions of Section E, Condition 2, 3 and 4 of this Order (DSE-413A-86) are not met.**

   (9 VAC 5-80-110 and Condition 6 of Section E of DSE-413A-86 RACT)

   * "Plant" refers to Reynolds Metals Company's – Bellwood Printing Plant in Chesterfield County.

   ** For the purpose of Title V compliance, records required by E.6. of Section E of RACT Order DSE-413A-86 shall be kept available at the Bellwood Printing Plant for at least a **five** year time period.

No discussion of the "limitations, parameters, monitoring, recordkeeping, and reporting" was performed as the RACT was submitted for public comment before it was issued and is considered part of the State of Virginia's SIP which has to be approved by EPA.

RACT DSE-414A-86 - The applicable requirements from the RACT (DSE-414A-86) are listed below.

A. Bellwood Printing Plant Limitations:

1. In SIP Order DSE-413A-86, Section E, Conditions 2, 3, and 4*, the facilities are designated and the RACT emission limits are specified. Reynolds agrees to meet, or as appropriate continue to meet, the requirements set in DSE-413A-86 for the specified equipment beginning on December 31, 1987.

   (9 VAC 5-80-110 and Condition 2 of Section E of RACT Order DSE-414A-86)

2. In SIP Order DSE-413A-86 for the Bellwood Plant, Section E, Condition 5*, the Daily VOC Model is described. Reynolds agrees to implement this model on December 31, 1987. In the interim time period, Reynolds agrees to continue to utilize its existing record keeping system which is described in Condition 8 in this Section of this Order.

   (9 VAC 5-80-110 and Condition 3 of Section E of RACT Order DSE-414A-86)

   * As listed under "X. Process Equipment Requirements – (emission unit ID# 021 – Nos. 1, 2, 3, 4, 6, 8, 9, 10 and 11 Printing Presses; Nos. 1, 2 and 3 Extruders - emission unit ID# 024).

B. Bellwood Printing Plant Monitoring and Recordkeeping:

1. In SIP Order DSE-413A-86, Section E, Conditions 2, 3, and 4*, the facilities are designated and the RACT emission limits are specified. Reynolds agrees to meet, or as appropriate continue to meet, the requirements set in DSE-413A-86 for the specified equipment beginning on December 31, 1987.

   (9 VAC 5-80-110 and Condition 2 of Section E of RACT Order DSE-414A-86)

2. In SIP Order DSE-413A-86 for the Bellwood Plant, Section E, Condition 5*, the Daily VOC Model is described. Reynolds agrees to implement this model on December 31, 1987. In the interim time period, Reynolds agrees to continue to utilize its existing record keeping system which is described in Condition 8 in this Section of this Order.

   (9 VAC 5-80-110 and Condition 2 of Section E of RACT Order DSE-414A-86)

   *: As listed under "X. Process Equipment Requirements – (emission unit ID# 021 – Nos. 1, 2, 3, 4, 6, 8, 9, 10 and 11 Printing Presses; Nos. 1, 2, and 3 Extruders - emission unit ID# 024).

No discussion of the "limitations, parameters, monitoring, recordkeeping, and reporting" was performed as the RACT was submitted for public comment before it was issued and is considered part of the State of Virginia's SIP which has to be approved by EPA.

CAM – Compliance Assurance Monitoring – CAM has been added for Press #3 of Emission Unit ID 21 in Conditions X.B. 3-10. Monitoring consists of the thermal oxidizer chamber temperature being continuously monitored to verify Overall Control Efficiency (ODE) of 65% as per X.A.3.

Permit Dated August 5, 2002- The applicable requirements from the permit conditions are listed below.

LIMITATIONS

Emission Controls:

1. Volatile organic compound (VOC) emissions from the No. 5 Extruder (emission unit ID # 022) shall be reduced by the use of compliant inks or surface coating as defined in 9 VAC 5-40-5070 of State Regulations.
   (9 VAC 5-80-110 and Condition 3 of 8/5/02 Permit)

2. Volatile organic compound (VOC) emissions shall, to the extent practicable, be controlled or reduced from cleanup, washup, or/and disposal and shall include the following, or equivalent, as a minimum.

   a. VOC shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.

   b. All VOC containing receptacles shall be closed at all times except during loading and unloading.

   c. VOC emissions shall be controlled and/or reduced by storing cleaning solutions and applicators in covered containers or machines with remote reservoirs when not in use.

   (9 VAC 5-80-110 and Condition 4 of 8/5/02 Permit)

OPERATING/EMISSION LIMITATIONS

Material Usage:

3. Volatile organic compounds as applied to No. 5 Extruder (emission unit ID# 022) shall not exceed 45 tons per year, calculated monthly as the sum of the previous consecutive twelve (12) months. VOC as applied shall include: (1) the VOC in the inks, coatings, treats, waxes, and other surface applications applied to the substrate, and (2) the VOC in any cleaning material used during a particular job.
(9 VAC 5-80-110 and Condition 5 of 8/5/02 Permit)

4. The natural gas dryers (associated with emission unit ID# 022) are restricted to natural gas and propane and fuel limitations listed below. Usage shall be calculated monthly as the sum of the previous consecutive 12 months' usage.

NATURAL GAS:	
Minimum heat content:	1025 Btu/scf HHV.
Maximum 12 months usage:	25.6×10^6 cf.
PROPANE:	
Minimum heat content:	91.5 mmBtu/1000 gal HHV.
Maximum 90 days per year usage:	70,800 gallons.

(9 VAC 5-80-110 and Condition 6 of 8/5/02 Permit)

Emission Limits:

5. Emissions from the operation of the flame dryers (associated with emission unit ID# 022), shall not exceed the limits specified below:

Nitrogen Oxides (as NO_2)	0.5 lbs/hr	1.5 tons/yr*
Carbon Monoxide	0.3 lbs/hr	1.4 tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 7 of the 8/5/02 Permit)

Visible Emission Limit:

6. Visible emissions from No. 5 Extruder (emission unit ID# 022) shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

   (9 VAC 5-50-80, 9 VAC 5-80-110 and Condition 8 of the 8/5/02 Permit)

C. Monitoring and Recordkeeping

On Site Records:

1. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Region. These records shall include, but are not limited to:

   a. Daily records demonstrating compliance with the requirements in **Air Quality Program Policies and Procedures document #AQP-4, Procedures for Maintaining Records for Surface Coating Operations and Graphic Arts Printing Processes states the following**:

      1. The owner shall maintain the following information at all times:

         a. Coating application system number.

         b. Hours of operation per day and per year.

         c. Method of application.

         d. Number and types of coats applied to the substrate.

         e. Drying method.

         f. Substrate type.

      2. The owner shall maintain the following information for **each coating** at all times:

         a. Supplier name, coating name and identification number.

         b. Coating density (pounds per gallon).

         c. Volatile content of coating as supplied (percent by weight).

         d. Water content of coating as supplied (percent by weight).

e. Exempt solvent content of coating as supplied (percent by weight).

f. Solids content of coating as supplied (percent by volume)

g. Name of diluent added, if any.

h. Identification number of diluent.

i. Diluent volatile organic compound density (pounds per gallon).

j. Volatile organic compound content of diluent (percent by weight).

k. Exempt solvent content of diluent (percent by weight).

l. Diluent/coating ratio (gallon diluent per gallon coating).

3. The owner shall maintain the following information for **each coating application system** on a **daily** basis:

   a. Coating application system number.

   b. Time period of each application run.

   c. Coating identification number.

   d. Amount of coating used.

   e. Diluent and clean up solvent identification numbers.

   f. Amount of diluent used.

   g. Amount of clean up solvents used.

   h. Calculated volatile organic compound emissions.

4. Additional recordkeeping requirements for surface coating operations with add-on control systems.

a. The owner shall maintain the following information at all times:

(1) Control device identification number and model number.

(2) Manufacturer.

(3) Installation date.

(4) Coating application systems controlled.

(5) Whether or not the control device is always in operation when the system it is serving is in operation.

(6) Type of control device.

(7) Destruction or removal efficiency.

(8) Date tested (if not tested, method of determining destruction efficiency).

(9) Design combustion temperature (degrees Fahrenheit) for thermal incinerators.

(10) Design exhaust gas temperature (degrees Fahrenheit), design temperature rise across catalyst bed (degrees Fahrenheit), and anticipated frequency of catalyst change for catalytic incinerators.

(11) Design inlet temperature of cooling medium (degrees Fahrenheit) and design exhaust gas temperature (degrees Fahrenheit) for a condenser.

(12) Design pressure drop across the adsorber at breakthrough, specific volatile organic compound species analyzed, and its concentration at breakthrough for a carbon adsorber.

(13) Emission test results, including inlet volatile organic

organic compound concentration (parts per million), outlet VOC concentration (parts per million), method of concentration determination, and date of determination.

(14) Type and location of capture system.

(15) Capture efficiency (percent).

(16) Method of determining capture efficiency.

b. Records demonstrating inks used meet the definition of compliant ink in 9 VAC 5-40-5070. The records shall be available as paper copy material safety data sheets, electronic material safety data sheets, vendor specifications, or current certified product data sheets (CPDS) or test data of which the information contained therein is determined using approved EPA test methods (e.g. 40 CFR part 60 appendix A – EPA Method 24).

c. Monthly material balance of VOC used at No. 5 Extruder (emission unit ID# 022), to include:

(i) VOC as applied to No. 5 Extruder (as defined in Condition 5 of the 8/5/02 permit)

(ii) VOC calculation of emissions

d. Annual VOC emission calculations, calculated monthly as the sum of the previous consecutive twelve months' emissions.

e. The throughput of natural gas and propane calculated monthly as the sum of the previous consecutive 12 months' fuel throughput. Fuel usage may be based on actual hours of operation of the driers.

f. Calculated air pollutants from No. 5 Extruder (emission unit ID# 022), using a calculation method approved by the Piedmont Region to verify compliance with the lb/hr and annual emissions limit in Condition Number seven (of the 8/5/02 permit).

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50, 9 VAC 5-80-110 and Condition 12 of 8/5/02 Permit)

2. The emissions from the No. 5 Extruder (emission unit ID# 022) shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If an emission point is not operated during the calendar month, then no visible emission observation needs to be performed and a negative declaration shall be entered in the record. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record stating the emission unit was not in operation. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record along with the date(s) of operation, the hours of operation of the emission unit and a notation indicating inclement weather.

   (9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-50-410)

3. Records shall be kept once per week when the machine operates noting compliance or noncompliance, to the extent practicable, with Condition No. 4 of the 8/5/02 NSR permit and what and when corrective actions were taken to bring it back into compliance.

   (9 VAC 5-80-110 E and F)

D. Testing

Ink Tests:

1. The facility shall test, at the request of the Department of Environmental Quality, to determine if inks used at the facility meet the definition of compliant ink as stated in 9 VAC 5-40-5070.

   (9 VAC 5-50-260 and Condition 9 of the 8/5/02 Permit)

Periodic Monitoring for the No. 5 Extruder (emission unit ID # 022).

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. The information listed below describes the periodic monitoring

monitoring requirements for all of the applicable requirements for significant sources in the NSR permit issued on August 5, 2002. The requirements are generally contained in the permit issued on August 5, 2002 but some conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

Condition 3 of the August 5, 2002 NSR permit:

Limitation: Volatile organic compound (VOC) emissions from the No. 5 Extruder (emission unit ID # 022) shall be reduced by the use of compliant inks or surface coating as defined in 9 VAC 5-40-5070 of State Regulations. **Parameter:** Ensuring the compliant inks or surface coatings are being used to reduce the VOC emissions. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition Nos. 12 (a. and b.) and 9 (respectively) of the August 5, 2002 NSR permit in addition to what was italicisized:

a. Daily records demonstrating compliance with the requirements in **Air Quality Program Policies and Procedures document #AQP-4, Procedures for Maintaining Records for Surface Coating Operations and Graphic Arts Printing Processes**

b. Records demonstrating inks used meet the definition of compliant ink in **9 VAC 5-40-5070**. The records shall be available as paper copy material safety data sheets, electronic material safety data sheets, vendor specifications, *or current certified product data sheets (CPDS)* or test data *of which the information contained therein is determined using approved EPA test methods (e.g. 40 CFR part 60 appendix A – EPA Method 24).*

9 VAC 5-40-5070 for "**compliant ink**" states the following:

"**Compliant ink or surface coating**" means an ink or surface coating conforming to the definition of a **high-solids**, **low-volatile organic compound** or a **waterborne ink** or surface coating.

"**High-solids ink or surface coating**" means an ink or surface coating which contains 60% or more nonvolatile compounds by volume.

"**Low solvent ink or surface coating**" means an ink or surface coating which contains not more than 0.5 pounds of volatile organic compounds per pound of nonvolatile compounds and is used on a packaging rotogravure printing or flexographic printing press.

"**Waterborne ink or surface coating**" means an ink or surface coating whose volatile portion consists of 75% or more by volume of water and 25% or less by volume of volatile organic compounds.

compounds.

and

> The facility shall test, at the request of the Department of Environmental Quality, to determine if inks used at the facility meet the definition of compliant ink as stated in 9 VAC 5-40-5070.
>
> (9 VAC 5-50-260 and Condition 9 of the 8/5/02 Permit)

Condition 4 of the August 5, 2002 NSR permit:

Limitation: Volatile organic compound (VOC) emissions shall be, to the extent practicable, controlled or reduced from cleanup, washup, or/and disposal and shall include the following, or equivalent, as a minimum.

a. VOC shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.

b. All VOC containing receptacles shall be closed at all times except during loading and unloading.

c. VOC emissions shall be controlled and/or reduced by storing cleaning solutions and applicators in covered containers or machines with remote reservoirs when not in use.

Parameter: Determine if VOCs are being controlled or reduced as according to Condition No. 4 of August 5, 2002 NSR permit. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

> Records shall be kept once per shift noting compliance or noncompliance to the extent practicable with Condition No. 4 of the 8/5/02 NSR permit and what and when corrective actions were taken to bring it back into compliance.

Condition 5 of the August 5, 2002 NSR permit:

Limitation: Material Usage: Volatile organic compounds as applied to No. 5 Extruder (emission unit ID# 022) shall not exceed 45 tons per year, calculated monthly as the sum of the previous consecutive twelve (12) months. VOC as applied shall include: (1) the VOC in the inks, coatings, treats, waxes, and other surface applications applied to the substrate, and (2) the VOC in any cleaning material used

VOC in any cleaning material used during a particular job. **Parameter:** Determine if the volatile organic compounds as applied does not exceed 45 tons per year and to ensure all of the applicable VOCs are being accounted for. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No.12 of the August 5, 2002 NSR permit:

a. Daily records demonstrating compliance with the requirements in Air Quality Program Policies and Procedures document #AQP-4, Procedures for Maintaining Records for Surface Coating Operations and Graphic Arts Printing Processes

   and

c. Monthly material balance of VOC used at No. 5 Extruder (emission unit ID# 022), to include:

   (i) VOC as applied to extruder number five (as defined in Condition 5 of the 8/5/02 permit)

   (ii) VOC calculation of emissions

Condition 6 of the August 5, 2002 NSR permit:

Limitation: The natural gas driers (associated with emission unit ID# 022) are restricted to natural gas and propane and fuel limitations listed below. Usage shall be calculated monthly as the sum of the previous consecutive 12 months' usage.

NATURAL GAS:	
Minimum heat content:	1025 Btu/scf HHV.
Maximum 12 months usage:	25.6×10^6 cf.
PROPANE:	
Minimum heat content:	91.5 mmBtu/1000 gal HHV.
Maximum 90 days per year usage:	70,800 gallons.

Parameter: Determine if only the permitted fuels are being burned, the required minimum heat content and the fuel limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring and Recordkeeping will be as according to the following, for Condition No. 12 e. of the August 5, 2002 NSR permit which states the following as it denotes the type of fuel being burned and how much fuel is burned:

e. The throughput of natural gas and propane calculated monthly as the sum of the previous consecutive 12 months' fuel throughput. Fuel usage may be based on actual hours of operation of the dryers.

In addition, it is configured to only burn natural gas and propane. To make a change in fuel, the dryers would have to be reconfigured.

Condition 7 of the August 5, 2002 NSR permit:

Limitation: Emissions from the operation of the flame dryers, shall not exceed the limits specified below:

Nitrogen Oxides (as NO_2)	0.5 lbs/hr	1.5 tons/yr*
Carbon Monoxide	0.3 lbs/hr	1.4 tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Volatile Organic Compound Emissions from the operation of No. 5 Extruder, shall not exceed the limits specified below:

Volatile Organic Compounds	30 lbs/hr	45 tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping of the annual emission limits established for the dryers is based on the consumption of VOCs by the dryers along with the natural gas/propane consumed on an annual basis over a twelve month consecutive basis of which is limited in terms of the annual VOC throughput limit of the permit and the annual natural gas/propane gas fuel consumption. Therefore, as long as the throughput is not exceeded the annual emission limits should not be violated. Recordkeeping demonstrating compliance with the annual throughput limits can be used to demonstrate compliance with the criteria pollutant annual emission limits, therefore the throughput limits satisfy the periodic monitoring requirement for the emission limits and recordkeeping will be as according to the monitoring and recordkeeping, for Condition Nos. 6 and 12e. of the August 5, 2002 NSR permit. In addition, if the dryers are not exceeding their maximum rated capacity then they should not be exceeding their short term limits of lbs/hr.

Condition 8 of the August 5, 2002 NSR permit:

Limitation: Visible emissions from No. 5 Extruder shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction. **Parameter:** Ensure opacity does not exceed 10 percent. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

2. The emissions from No. 5 Extruder (emission unit ID # 022) shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If an emission point is not operated during the calendar month, then no visible emission observation needs to be performed and a negative declaration shall be entered in the record stating the emission unit was not in operation. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record along with the date(s) of operation, the hours of operation of the emission unit and a notation indicating inclement weather.

<u>Permit Dated October 29, 1998</u> - The applicable requirements from the permit conditions are listed below.

1. Volatile organic compound (VOC) emissions from the No. 7 Printing Press (emission unit ID# 23) shall be controlled by use of compliant inks (as defined under 9 VAC 5-40-5070) and limiting the VOCs as applied. The printing press shall be provided with adequate access for inspection.

   (9 VAC 5-80-110 and Condition 3 of 10/29/98 Permit)

2. The VOCs as applied for the operation and cleaning of the No. 7 Printing Press (emission unit ID# 23) shall be no more than 96.0 tons per year, calculated monthly as the sum of each consecutive 12 month period. VOCs as applied shall include: 1) the VOC in the inks, coatings, treats, waxes, adhesives, thinners and other surface applications applied to the substrate, and 2) the VOC in any cleaning materials used during a particular production job. VOC emissions from the operation and job specific cleaning of the No. 7 Press (emission

specific cleaning of the No. 7 Press (emission unit ID# 23) shall be calculated using a material balance (based on recordkeeping as required under AQP-4) of the job-specific materials issued to the job less the job specific materials returned to inventory. The VOC emissions shall be calculated monthly for the total of the previous twelve month period.

(9 VAC 5-80-110 and Condition 4 of 10/29/98 Permit)

3. Visible emissions from the No. 7 Printing Press (emission unit ID# 23) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110 and Condition 6 of 10/29/98 Permit)

4. Emissions from the operation of the No. 7 Printing Press (emission unit ID# 23) shall not exceed the limits specified below:

Volatile Organic Compounds	507.5	lbs/hr	12,180.0	lbs/day	96.0	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 5 of 10/29/98 Permit)

Periodic Monitoring for the No. 7 Printing Press (emission unit ID #023).

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. The information listed below describes the periodic monitoring requirements for all of the applicable requirements for significant sources in the NSR permit issued on October 29, 1998. The requirements are generally contained in the permit issued on October 29, 1998 but some conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

Condition 3 of the October 29, 1998 NSR permit:

Limitation: Volatile organic compound (VOC) emissions from the No. 7 Printing Press (emission unit ID# 23) shall be controlled by use of compliant inks (as defined under 9 VAC 5-40-5070) and limiting the VOCs as applied. The printing press shall be provided with adequate access for inspection. **Parameter:** Ensuring the inks or surface coating used are compliant inks or surface coating to reduce amount of VOCs. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be demonstrated by the monitoring and recordkeeping for Condition No. 7 a. of the October 29, 1998 NSR permit.

Condition 4 of the October 29, 1998 NSR permit:

Limitation: The VOCs as applied for the operation and cleaning of the No. 7 Printing Press (emission unit ID# 23) shall be no more than 96.0 tons per year, calculated monthly as the sum of each consecutive 12 month period. VOCs as applied shall include: 1) the VOC in the inks, coatings, treats, waxes, adhesives, thinners and other surface applications applied to the substrate, and 2) the VOC in any cleaning materials used during a particular production job. VOC emissions from the operation and job specific cleaning of the No. 7 Press (emission unit ID# 23) shall be calculated using a material balance (based on recordkeeping as required under AQP-4) of the job-specific materials issued to the job less the job specific materials returned to inventory. The VOC emissions shall be calculated monthly for the total of the previous twelve month period. **Parameter:** Determine if the volatile organic compounds as applied does not exceed 45 tons per year and to ensure all of the applicable VOCs are being accounted for. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No.7 b. and c. of the October 29, 1998 NSR permit.

Condition 6 of the October 29, 1998 NSR permit:

Limitation: Visible emissions from No. 7 Printing Press (emission unit ID# 23) shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). **Parameter:** Ensure opacity does not exceed 20 percent. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

The emissions from the No. 7 Printing Press (emission unit ID# 23) shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If an emission point is not operated during the calendar month, then no visible emission observation needs to be performed and a negative declaration shall be entered in the record stating the emission unit was not in operation. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record along with the date(s) of operation, the hours of operation of the emission unit and a notation indicating inclement weather.

Condition 5 of the October 29, 1998 NSR permit:

Limitation: Emissions from the operation of the No. 7 Printing Press (emission unit ID# 23) shall not exceed the limits specified below:

Volatile Organic Compounds	507.5	lbs/hr	12,180.0	lbs/day	96.0	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring will be performed monthly and recordkeeping will be kept monthly as according to the monitoring and recordkeeping, for Condition No. 7 b. and c of the October 29, 1998 NSR permit.

Permit Dated May 15, 2002 - The applicable requirements from the permit conditions are listed below.

1. Volatile organic compound (VOC) emissions from the No. 2 Laminator (emission unit ID# 030) printing/ coating stations, when applying non-compliant inks and coatings (i.e., those not meeting the criteria in 9 VAC 5-40-5080 A. 1., 2., or 3., and required to install an emissions control system) shall be controlled by a 100 percent efficient capture system and a thermal fume incinerator having a minimum destruction efficiency of 96.5 percent. The No. 2 Laminator (emission unit ID# 030) and the incinerator shall be provided with adequate access for inspection.

   or

   Volatile organic compound (VOC) emissions from the No. 2 Laminator (emission unit ID# 029) printing/ coating stations shall be controlled by the use of compliant inks and coatings (those meeting the criteria of 9 VAC 5-40-5080 A. 1., 2., or 3.)
   (9 VAC 5-80-110 and Condition 3 of 5/15/02 Permit)

2. During periods when compliant inks and coatings are used, Reynolds Metals Company shall be permitted to exhaust the individual station(s) to atmosphere. Compliant inks and coatings shall be determined on an "as applied" basis per station. Averaging of the VOC content of the inks and coatings across stations to comply with 9 VAC 5-40-5080 A.1., 2., or 3. is not permitted. No incinerator efficiency shall be applied to the compliant ink usage. These emissions shall not

usage. These emissions shall not be credited to the incinerator. The emissions shall be accounted for in the daily recordkeeping to determine compliance with emission limits specified in Condition 9 of the 5/15/02 permit.

(9 VAC 5-80-110 and Condition 4 of 5/15/02 Permit)

3. The thermal fume incinerator (associated with emission unit ID# 030) shall maintain a minimum combustion zone temperature of 1400^{o}F and a minimum retention time of 0.5 seconds. The incinerator shall be equipped with a device to continuously measure the temperature of the combustion zone and an indication of date and time.

   (9 VAC 5-80-110 and Condition 5 of 5/15/02 Permit)

4. Each total enclosure of the capture system shall meet the following criteria:

   a. Any natural draft openings shall be at least four equivalent opening diameters from each VOC emitting point;

   b. The total area of all natural draft openings shall not exceed five percent of the surface area of the enclosure's four walls, floor and ceiling;

   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.

   a. All access doors and windows shall be closed during routine operation of the laminator printing/coating stations.

   (9 VAC 5-80-110 and Condition 6 of 5/15/02 Permit)

5. The approved auxiliary fuels for the dryers and the thermal oxidizer are natural gas and a propane/air mixture. A change in the fuel may require a permit to modify and operate.

   (9 VAC 5-80-110 and Condition 8 of the 5/15/02 Permit)

6. The No. 2 Laminator (emission unit ID# 030) shall operate at a maximum speed of 1,000 feet per minute while using inks and coatings that contain volatile organic compounds. There shall be no speed limitation while No. 2 Laminator (emission unit ID# 029) is using inks and coatings that contain no volatile organic compounds.

   (9 VAC 5-80-110 and Condition 7 of the 5/15/02 Permit)

7. Visible emissions from the No. 2 Laminator (emission unit ID# 029 and 030) process shall not exceed 20 % opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 % opacity.

   (9 VAC 5-50-80 and 9 VAC 5-80-110)

8. Emissions from the operation of the No. 2 Laminator (emission unit ID# 030) shall not exceed the limits specified below:

Volatile Organic Compounds	57.5 lbs/hr	1,380 lbs/day	29.6 tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 9 of the 5/15/02 Permit)

9. **Ink Tests** – The DEQ may require testing to determine if compliant ink meets the definition of compliant ink contained in 9 VAC 5-40-5070 of the Regulations.
(9 VAC 5-80-110 and Condition 10 of the 5/15/02 Permit)

Periodic Monitoring for the No. 2 Laminator (emission unit ID# 030).

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. The information listed below describes the periodic monitoring requirements for all of the applicable requirements for significant sources in the NSR permit issued on May 15, 2002. The requirements are generally contained in the permit issued on May 15, 2002 but some conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

Condition 3 of the May 15, 2002 NSR permit:

Limitation: Volatile organic compound (VOC) emissions from the No. 2 Laminator (emission unit ID# 030) printing/coating stations, when applying non-compliant inks and coatings (i.e., those not meeting the criteria in 9 VAC 5-40-5080 A. 1., 2., or 3., and required to install an emissions control system) shall be controlled by a 100 percent efficient capture system and a thermal fume incinerator having a minimum destruction efficiency of 96.5 percent. The No. 2 Laminator (emission unit ID# 030) and the incinerator shall be provided with adequate access for inspection.

Or

Volatile organic compound (VOC) emissions from the No. 2 Laminator (emission unit ID# 029) printing/ coating stations shall be controlled by the use of compliant inks and coatings (those meeting the criteria of 9 VAC 5-40-5080 A.1., 2., or 3.)

Parameter: Determine if the capture system is 100% efficient and if the destruction efficiency of the incinerator is 96.5% when using non-compliant inks and coatings or if they are using compliant inks and coatings ensure they meet the definition of compliant inks and coatings. **Monitoring and Recordkeeping:** Monitoring for 100% capture efficiency may be determined by (Condition Nos. 6 and

by (Condition Nos. 6 and 11a. of the May 15, 2002 NSR permit) and recordkeeping will be as according to the monitoring and recordkeeping, for Condition Nos. 5, 10, 11 a., b., and c. of the May 15, 2002 NSR permit.

Condition 4 of the May 15, 2002 NSR permit:

Limitation: During periods Reynolds Metals Company shall be permitted to exhaust the individual station(s) to atmosphere. Compliant inks and coatings shall be determined on an "as applied" basis per station. Averaging of the VOC content of the inks and coatings across stations to comply with 9 VAC 5-40-5080 A. 1., 2., or 3. is not permitted. No incinerator efficiency shall be applied to the compliant ink usage. These emissions shall not be credited to the incinerator. The emissions shall be accounted for in the daily recordkeeping to determine compliance with emission limits specified in Condition 9 of the 5/15/02 permit. **Parameter:** Ensure the emission limits are not exceeded when using compliant inks and coatings on an as applied basis per station. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to Conditions 10 and 11 a. and c. of the May 15, 2002 NSR permit.

Condition 5 of the May 15, 2002 NSR permit:

Limitation: The thermal fume incinerator (associated with emission unit ID# 030) shall maintain a minimum combustion zone temperature of 1400^{o}F and a minimum retention time of 0.5 seconds. The incinerator shall be equipped with a device to continuously measure the temperature of the combustion zone and an indication of date and time. **Parameter:** Ensure the combustion zone temperature or destruction temperature does not drop below the minimum required temperature and that the gases remain in the combustion zone for 0.5 seconds so there is complete destruction of the VOCs. **Monitoring and Recordkeeping:** The following monitoring and recordkeeping was added to ensure the proper combustion (destruction) temperature would be maintained:

The No. 2 Laminator (emission unit ID # 030) thermal oxidizer's combustion zone temperature shall be monitored through an interlock system incorporated into the oxidizer operation control panel which has at a minimum a set point temperature of 1400^{o}F. If the oxidizer temperature falls below the minimum set point temperature of 1400^{o}F, the interlock shall shut down the laminator. Records shall be kept of the date and time that the interlock shutdown occurs.
(9 VAC 5-80-110 E and F)

The following is the rational for not having periodic monitoring for the 0.5 second residence time:

It was determined the monitoring for the minimum residence time of 0.5 second is already being met and will continue to be met. As the Bellwood Printing Plant has submitted information which stated the thermal oxidizer was designed for 38,000 scfm with a residence time of 0.5 second. If the speed of the fan decreases and the chamber size remains constant the residence time will only increase which will

time will only increase which will only increase the amount of time for destruction of VOCs. (In addition, this unit does have a variable speed fan.)

An annual calibration shall be performed on the current thermocouples for the thermal oxidizer's combustion zone (associated with emission unit ID# 030) temperature in accordance with written procedures recommended by the thermocouple manufacturer. Annual records shall be kept stating the date the calibration was performed along with the calibration results.

Condition 6 of the May 15, 2002 NSR permit:

Limitation: Each total enclosure of the capture system shall meet the following criteria:

a. Any natural draft openings shall be at least four equivalent opening diameters from each VOC emitting point;

b. The total area of all natural draft openings shall not exceed five percent of the surface area of the enclosure's four walls, floor and ceiling;

c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure.

d. All access doors and windows shall be closed during routine operation of the laminator printing/coating stations.

Parameter: Ensure the capture system continues to remain as a total enclosure of 100% capture.
Monitoring and Recordkeeping: Monitoring and recordkeeping will be as according to the following:

The average facial velocity of air through the natural draft openings for the No. 2 Laminator's (emission unit ID # 030) total enclosures shall be monitored by a differential pressure meter which is connected to an alarm system located on the operator's control panel. If the differential pressure meter, indicates a pressure drop below 0.007 inches of H_2O (equates to 200 fpm) for fifteen minutes, records will be kept of the date and time that the differential pressure dropped below 0.007 inches of H_2O (equates to 200 fpm) and of the immediate corrective action taken.

Condition 8 of the May 15, 2002 NSR permit:

Limitation: The approved auxiliary fuels for the dryers and the incinerator (emission unit ID # 030) is natural gas and a propane/air mixture. A change in the fuel may require a permit to modify and operate.
Parameter: Determine there has been no change in fuels to possibly a dirtier fuel. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will not be necessary due to the following:

The dryers (emission unit ID # 030) and the incinerator is configured to only burn natural gas and a propane/air mixture. To make a change in fuel, the dryers and the incinerator would have to be reconfigured to burn a liquid fuel such as distillate oil.

Condition 7 of the May 15, 2002 NSR permit:

Limitation: The No. 2 Laminator (emission unit ID# 030) shall operate at a maximum speed of 1,000 feet per minute while using inks and coatings that contain volatile organic compounds. There shall be no speed limitation while the No. 2 Laminator (emission unit ID# 029) is using inks and coatings that contain no volatile organic compounds. **Parameter:** Determine the maximum speed is not being exceeded when utilizing inks and coatings which contain volatile organic compounds. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

The digital readout of the speed of the No. 2 Laminator (emission unit ID #030) shall be tracked by data acquisition.

Limitation: Visible emissions from the No. 2 Laminator (emission unit ID# 029 and 030) process shall not exceed 20 % opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 % opacity. **Parameter:** Ensure opacity does not exceed 20 percent except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

The emissions from the No. 2 Laminator (emission unit ID# 029 and 030) shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If an emission point is not operated during the calendar month, then no visible emission observation needs to be performed and a negative declaration shall be entered in the record stating the emission unit was not in operation. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record along with the date(s) of operation, the hours of operation of the emission unit and a notation indicating inclement weather.

Condition 9 of the May 15, 2002 NSR permit:

Limitation: Emissions from the operation of No. 2 Laminator (emission unit ID# 030) shall not exceed the limits specified below:

Volatile Organic Compounds	57.5 lbs/hr	1380 lbs/day	29.6 tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be performed daily and monthly of the VOCs emissions as according to the monitoring and recordkeeping, for Condition No. 11a. of the May 15, 2002 NSR permit.

The annual emissions can be tracked by the number of hours of operation per day and year along with the calculated volatile organic compound emissions in addition to the information which is required to support these calculations. However, the following recordkeeping was added to demonstrate the annual emissions on a monthly basis as noted by the "*" in the emission limitation:

"Annual VOC emission calculations, calculated monthly as the sum of the previous consecutive twelve months' emissions."

In addition, monitoring of the hourly emission limits shall be a combination of Condition No. 11a. (i.e. AQP-4) and Condition No. 7 of the May 7 of the May 15, 2002 which has a maximum speed limitation. Monitoring and Recordkeeping of the maximum speed limitation will be as according to the following:

"The digital readout of the speed of No. 2 Laminator (emission unit ID #030) shall be tracked by data acquisition."

Compliance Assurance Monitoring (CAM) – Monitoring has also been added for the #2 Laminator's thermal oxidizer under the Compliance Assurance Monitoring (CAM) program through Section V.B. Conditions 8-15. The parameters to be monitored will be the thermal oxidizer temperature and permanent total enclosure (PTE which is used to determine the minimum destruction of 96.5% of the 100% effective capture system). Also being monitored is the minimum differential pressure of 0.007" W.C. (EPA method 204) in order to meet the PTE requirements.

<u>Permit Dated May 15, 2002</u> - The applicable requirements from the permit conditions are listed below.

1. The throughput of VOC of all product quality printing/laminating processes (emission unit ID# 027) at the Packaging Technology Center and Process Development Center shall be no more than 400.0 pounds in any 30 day period, calculated monthly as the sum of each consecutive 12 month period.

   (9 VAC 5-80-110 and Condition 3 of 5/15/02 Permit)

2. The throughput of VOC of all product quality coating/laminating processes (emission unit ID#s 028) at the Process Development Center shall be no more than 400.0 pounds in any 30 day period, calculated monthly as the sum of each consecutive 12 month period.

   (9 VAC 5-80-110 and Condition 4 of 5/15/02 Permit)

3. Visible emissions from the product quality printing/laminating unit (emission unit ID# 027) at the Packaging Technology Center shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

   (9 VAC 5-50-80, 9 VAC 5-80-110 and Condition 8 of 5/15/02 Permit)

4. Total emissions from the operation of all product quality printing/laminating processes (emission unit ID# 027) at the Packaging Technology Center and Process Development Center shall not exceed the limitations specified below:

Volatile Organic Compounds	400	lbs/month	2.4	tons/yr*

   *Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.
   (9 VAC 5-80-110 and Condition 5 of 5/15/02 Permit)

5. Total emissions from the operation of all product quality coating/laminating processes at the Process Development Center (emission unit ID# 028) shall not exceed the limitations specified below:

Volatile Organic Compounds	400	lbs/month	2.4	tons/yr*

   *Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.
   (9 VAC 5-80-110 and Condition 6 of 5/15/02 Permit)

6. Notwithstanding the limitations specified in Conditions 5 and 6 of the 5/15/02 permit, total emissions from the operation of all product quality printing/laminating processes and coating/laminating processes at the Packaging Technology Center and Process Development Center (emission unit ID#s 027 and 028) shall not exceed the limitations specified below:

Volatile Organic Compounds	18.6	lbs/hr	4.8	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 7 of 5/15/02 Permit)

Periodic Monitoring for the product quality printing/laminating processes (emission unit ID#s 027 and 028).

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. The information listed below describes the periodic monitoring requirements for all of the applicable requirements for significant sources in the NSR permit issued on May 15, 2002. The requirements are generally contained in the permit issued on May 15, 2002 but some conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

Condition 3 of the May 15, 2002 NSR permit:

Limitation: The throughput of VOC of all product quality printing/laminating processes (emission unit ID# 027) at the Packaging Technology Center and Process Development Center shall be no more than 400 pounds in any 30 day period, calculated monthly as the sum of each consecutive 12 month period. **Parameter:** Ensuring the volatile organic compound throughput is not exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following: Recordkeeping demonstrating compliance with the annual throughput limits can be used to demonstrate compliance with the criteria pollutant emission limits; therefore, the throughput limits satisfy the periodic monitoring requirement for the emission limits and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No. 9 of the May 15, 2002 NSR permit. (As long as, the throughput limit is not violated, there should not be any possibility that the criteria pollutant emission limits should be violated.)

Condition 4 of the May 15, 2002 NSR permit:

Limitation: The throughput of VOC of all product quality coating/laminating processes (emission unit ID# 028) at the packaging Technology Center and Process Development Center shall be no more than 400 pounds in any 30 day period, calculated monthly as the sum of each consecutive 12 month period. **Parameter:** Ensuring the volatile organic compound throughput is not exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following: Recordkeeping demonstrating compliance with the annual throughput limits can be used to demonstrate compliance with the criteria pollutant emission limits; therefore, the throughput limits satisfy the periodic monitoring requirement for the emission limits and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No. 9. of the May 15, 2002 NSR permit. (As long as, the throughput limit is not violated, there should not be any possibility that the criteria pollutant emission limits should be violated.)

Condition 5 of the May 15, 2002 NSR permit:

Limitation: Total emissions from the operation of all product quality printing/laminating processes (emission unit ID# 027) at the Packaging Technology Center and Process Development Center shall not exceed the limitations specified below:

Volatile Organic Compounds	400	lbs/month	2.4	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be performed on a 30-day rolling average basis of the VOCs emissions as according to the monitoring and recordkeeping, for Condition No. 9 of the May 15, 2002 NSR permit. This emission unit is classified under product quality printing/coating and therefore is not subject to Rule 4-36 or Article 36 and as a result is not subject to AQP-4 monitoring and recordkeeping. In order to be classified as product quality printing/coating the emission unit must not exceed 400 lbs/month of VOCs and be exempt from Rule 4-36.

Condition 6 of the May 15, 2002 NSR permit:

Limitation: Total emissions from the operation of all product quality coating/laminating processes at the Process Development Center (emission unit ID# 028) shall not exceed the limitations specified below:

Volatile Organic Compounds	400	lbs/month	2.4	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be performed on a 30-day rolling average basis of the VOCs emissions as according to the monitoring and recordkeeping, for Condition No. 9 of the May 15, 2002 NSR permit. This emission unit is classified under product quality printing/coating and therefore is not subject to Rule 4-36 or Article 36 and as a result is not subject to AQP-4 monitoring and recordkeeping. In order to be classified as product quality printing/coating the emission unit must not exceed 400 lbs/month of VOCs and be exempt from Rule 4-36.

Condition 7 of the May 15, 2002 NSR permit:

Limitation: Notwithstanding the limitations specified in Conditions 5 and 6 above of the 5/15/02 permit, total emissions from the operation of all product quality printing/laminating processes and coating/laminating processes at the Packaging Technology Center and Process Development Center (emission unit ID#s 027 and 028) shall not exceed the limitations specified below:

Volatile Organic Compounds	18.6	lbs/hr	4.8	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not being exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be performed on a 30-day rolling average basis of the VOCs emissions as according to the monitoring and recordkeeping, for Condition No. 9 of the May 15, 2002 NSR permit. This emission unit is classified under product quality printing/coating and therefore is not subject to Rule 4-36 or Article 36 and as a result is not subject to AQP-4 monitoring and recordkeeping. In order to be classified as product quality printing/coating the emission unit must not exceed 400 lbs/month of VOCs and be exempt from Rule 4-36.

Condition 8 of the May 15, 2002 NSR permit:

Limitation: Visible emissions from the product quality printing/laminating unit (emission unit ID# 027) at the Packaging Technology Center shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). **Parameter:** Ensure opacity does not exceed 10

exceed 10 percent. **Monitoring and Recordkeeping:** Monitoring and Recordkeeping shall be as according to the following:

The emissions from the product quality printing/laminating unit (emission unit ID# 027) at the Packaging Technology Center shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if they have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If an emission point is not operated during the calendar month, then no visible emission observation needs to be performed and a negative declaration shall be entered in the record stating the emission unit was not in operation. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record along with the date(s) of operation, the hours of operation of the emission unit and a notation indicating inclement weather.

<u>Permit Dated May 30, 2001</u>- The applicable requirements from the permit conditions are listed below.

1. VOC emissions from the press parts washing machines (emission unit ID# 032) shall be controlled by a condenser recovery system. The unit shall be equipped with a temperature gauge. The condenser recovery system shall be provided with adequate access for inspection.

   (9 VAC 5-80-110 and Condition 3 of 5/30/01 Permit)

2. The operating rate of the three press parts washers shall not exceed 1 cycle/hour, per washing machine, when using a solvent based (greater than 4.5% VOC) wash solution. The operating rate of the three press part washing machines shall not exceed 3 cycles/hour, per washing machine, when using low solvent (4.5% VOC per less), based cleaning solution.

   (9 VAC 5-80-110 and Condition 4 of 5/30/01 Permit)

3. Except as specified in this permit, the solvent metal cleaning operation (emission unit ID# 032) is to be operated in compliance with (Rule 4-24) of State Regulations.

   (9 VAC 5-80-110 and Condition 5 of 5/30/01 Permit)

4. The water-based cleaning operations at the filter wash tank and the glue wash tank (emission unit ID# 032) shall be soap and water. A change in the operation may require a permit to modify and operate.

   (9 VAC 5-80-110 and Condition 6 of 5/30/01 Permit)

5. The solvents used in the press parts washing machines and the 43 gallon wash tank (emission unit ID# 032) shall contain no hazardous air pollutants (HAP) greater than one percent by weight. A change in the solvent HAP content may require a permit to modify and operate.

   (9 VAC 5-80-110 and Condition 7 of the 5/30/01 Permit)

6. The three parts washing machines and the 43 gallon wash tank (emission unit ID# 032) shall use no more than 53 tons volatile organic compounds (VOC) per year, calculated as the sum of each consecutive 12 month period. The manual wash tank shall use no more than 20 tons VOC per year, calculated as the sum of each consecutive 12 month period. The total use for the solvent metal cleaning operation shall not exceed 73 tons VOC per year, calculated as the sum of each consecutive 12 month period.

   (VAC 5-80-110 and Condition 9 of 5/30/01 Permit)

7. Visible emissions from the condenser recovery system process (associated with emission unit ID# 032) shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.

   (9 VAC 5-80-110)

8. Emissions from the operation of the three washing machines and the 43 gallon wash tank (emission unit ID# 032) shall not exceed the limits specified below:

Volatile Organic Compounds	lb/hr	tons/yr*

   *Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

   (VAC 5-80-110 and Condition 10 of 5/30/01 Permit)

9. Emissions from the operation of the manual wash tank (emission unit ID# 032) shall not exceed the limits specified below:

Volatile Organic Compounds	lb/hr	tons/yr*

   *Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

(VAC 5-80-110 and Condition 11 of 5/30/01 Permit)

Periodic Monitoring for the press parts washing machines, the 43 gallon wash tank, and the manual wash tank (emission unit ID #032)

The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act, that is subject to an applicable requirement. The information listed below describes the periodic monitoring requirements for all of the applicable requirements for significant sources in the NSR permit issued on May 30, 2001. The requirements are generally contained in the permit issued on May 30, 2001 but some conditions have been developed to ensure that the periodic monitoring requirements of 9 VAC 5-80-110 E.2. have been met.

Condition 3 of the May 30, 2001 NSR permit:

Limitation: VOC emissions from the press parts washing machines (emission unit ID# 032) shall be controlled by a condenser recovery system. The unit shall be equipped with a temperature gauge. The condenser recovery system shall be provided with adequate access for inspection. **Parameter:** Ensure the condenser recovery system is used to recover the VOC emissions and that an appropriate temperature gauge is kept in place which demonstrates the temperature being achieved is less than 40^{o}F as (Rule 4-24). **Monitoring and Recordkeeping:** Monitoring will be as according to the monitoring for Condition No. 5 of the May 30, 2001 NSR permit and the recordkeeping as according to the following:

Records shall be kept demonstrating compliance or non-compliance with "Emission standards for solvent metal cleaning operations using non-halogenated solvents (Rule 4-24)".

Condition 4 of the May 30, 2001 NSR permit:

Limitation: The operating rate of the three press parts washers shall not exceed 1 cycle/hour, per washing machine, when using a solvent based (greater than 4.5% VOC) wash solution. The operating rate of the three press part washing machines shall not exceed 3 cycles/hour, per washing machine, when using low solvent (4.5% VOC or less), based cleaning solution. **Parameter:** Ensure the hourly rated capacities are not being exceeded which may cause an exceedance of the hourly emission rate. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

Records shall be kept of the number of cycles/hr each press parts washer operated at and what % VOC cleaning solutions were used for each cycle.

Condition 5 of the May 30, 2001 NSR permit:

Limitation: Except as specified in this permit, the solvent metal cleaning operation (emission unit ID# 032) is to be operated in compliance with (Rule 4-24) of State Regulations. **Parameter:** Ensure the operations are in compliance with (Rule 4-24). **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

Records shall be kept demonstrating compliance with or non-compliance with "Emission standards for solvent metal cleaning operations using non-halogenated solvents (Rule 4-24)".

Condition 6 of the May 30, 2001 NSR permit:

Limitation: The water-based cleaning operations at the filter wash tank and the glue wash tank (emission unit ID# 032) shall be soap and water. A change in the operation may require a permit to modify and operate. **Parameter:** Ensure the cleaning operations are performed with soap and water. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping as follows:

Records shall be kept of the materials (i.e. solution) used to clean the filter wash tank and the glue wash tank.

Condition 7 of the May 30, 2001 NSR permit:

Limitation: The solvents used in the press parts washing machines and the 43 gallon wash tank (emission unit ID# 032) shall contain no hazardous air pollutants (HAP) greater than one percent by weight. A change in the solvent HAP content may require a permit to modify and operate **Parameter:** Ensure the solvents used contain $\leq$1% by weight of HAPs. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No. 12c. of the May 30, 2001 NSR permit.

Condition 9 of the May 30, 2001 NSR permit:

Limitation: The three parts washing machines and the 43 gallon wash tank (emission unit ID# 032) shall use no more than 53 tons volatile organic compounds (VOC) per year, calculated as the sum of each consecutive 12 month period. The manual wash tank shall use no more than 20 tons VOC per year, calculated as the sum of each consecutive 12 month period. The total use for the solvent metal cleaning operation shall not exceed 73 tons VOC per year, calculated as the sum of each consecutive 12 month period. **Parameter:** Determine if the VOC throughput limits are being exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No. 12 of the May 30, 2001 NSR permit.

Limitation: Visible emissions from the condenser recovery system process (associated with emission unit ID# 032) shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity. **Parameter:** Ensure the 20% opacity is not exceeded except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the following:

The emissions from the condenser recovery system process (control equipment associated with press parts washing machines (emission unit ID # 032)) shall be observed visually at least once each calendar month for at least a brief time period during normal operations to determine if they have above visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above normal visible emissions shall be followed up with a 40
CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. If an emission point is not operated during the calendar month, then no visible emission observation needs to be performed and a negative declaration shall be entered in the record stating the emission unit was not in operation. Should emission point operation be limited or intermittent, and/or adverse conditions (e.g. weather or darkness) prevail during the limited or intermittent operating period, no visible emission observation needs to be performed and a negative declaration shall be entered in the record along with the date(s) of operation, the hours of operation of the emission unit and a notation indicating inclement weather.

Condition 10 of the May 30, 2001 NSR permit:

Limitation: Emissions from the operation of the three washing machines and the 43 gallon wash tank (emission unit ID# 032) shall not exceed the limits specified below:

Volatile Organic Compounds	Lb/hr	tons/yr*

* Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No. 12 of the May 30, 2001 NSR permit.

Condition 11 of the May 30, 2001 NSR permit:

Limitation: Emissions from the operation of the manual wash tank (emission unit ID# 032) shall not exceed the limits specified below:

Volatile Organic Compounds	lb/hr	tons/yr*

*Annual emissions shall be determined monthly as the sum of each consecutive 12 month period.

Parameter: Ensure the emission limits are not exceeded. **Monitoring and Recordkeeping:** Monitoring and recordkeeping will be as according to the monitoring and recordkeeping, for Condition No. 12 of the May 30, 2001 NSR permit.

Compliance Assurance Monitoring (CAM) – CAM has been added in Conditions VIII.B.7-14. The water temperature at chill water supply will be monitored to indicate if the condensers are in compliance with the permit conditions.

(Article 25) Emission Standards for Volatile Organic Compound Storage and Transfer Operations from the State's Regulations
(Note: Aboveground Storage Tanks I.D. Nos. 1-16 and 18 are all constructed with submerged fill pipes as all of the listed tanks possibly could store material which has a vapor pressure >1.5 pounds per square inch absolute (PSIA) under actual storage conditions or, in the case of filling under actual filling conditions.)

Standard for Volatile Organic Compounds and the required control technology guidelines: Storage Tank I.D. Nos. 1-16 and 18 shall be equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 60% by weight of volatile organic compound emissions during the filling of such tank. The 60% reduction by weight shall be achieved by filling of Storage Tank I.D. Nos. 1-16 and 18 (IEU No. I10) through the use of a vapor control system such as a submerged fill pipe. **Parameter:** Ensure the volatile organic compound emissions are reduced by 60% at minimum by having a vapor control system in place which can achieve this level of reduction. **Monitoring and Recordkeeping:** No monitoring and recordkeeping will be needed to ensure this standard is being met as these requirements shall be physically in place and shall not be removed if so this will be noted in the semi-annual compliance certification.

5. 40 CFR 63 MACT Subpart KK - National Emission Standards for the Printing and Publishing Industry

Applicability

Subpart KK states the following concerning applicability:

"(a) The provision of this subpart apply to:

(1) Each new and existing facility that is a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2 at which publication rotogravure, or wide-web flexographic printing presses are operated,

Reynolds Metals currently uses and emits HAPs at levels above the major source levels or threshold of HAPs of 10 tons/yr of a single HAP and 25 tons/yr of an aggregate of HAPs. Conditions concerning major source requirements were inserted into the Title V permit as attachment C to ensure Reynolds Metals Company – Bellwood Printing Plant is in compliance with Subpart KK of 40 CFR 63.
Limitations: Applicable limitations are as per 40 CFR 63 MACT Subpart KK "attachment C".
Parameter: Ensure HAP emissions are being reduced as according to Subpart KK.
Monitoring and Recordkeeping: Monitoring and recordkeeping shall be as according to attachment C**.**

6. Obsolete conditions from permits that can be removed

The Part 70 regulations (condition 11 of the May 15, 2002 permit, condition 13 of the August 5, 2002 permit, condition 9 of the October 29, 1998 permit, condition 13 of the May 15, 2002 permit and condition 14 of May 30, 2001) define specific inspection and entry requirements consistent with the issuance of a Title V permit. These requirements are described in XIII. general condition Q. of the Title V permit and are at least as stringent as the NSR requirements. Inclusion of these conditions would be redundant and the requirements have been overtaken by the Title V (Part 70) regulations.

Condition 17 of the August 5, 2002 permit, condition 10 of the October 29, 1998 permit, condition 18 of the May 15, 2002 permit, condition 15 of the May 15, 2002 permit and condition 18 of the May 30, 2001 permit is not being included as an applicable requirement in the Title V permit because it is redundant. The general applicable requirement condition XIII.T.2. describes the requirements for transfer of ownership relative to the Title V permit. The transfer of ownership requirements for the NSR permit are therefore inappropriate for inclusion in the Title V permit.

Condition 12 of the May 15, 2002 permit, Condition 14 of the May 15, 2002 permit, Condition 11 of the August 5, 2002 permit and Condition 15 of the May 30, 2001 permit is not being included as an applicable requirement in the Title V permit because it is redundant. The general applicable requirement condition XIII.F describes the requirements for failure/malfunction reporting requirements for the NSR permit are therefore inappropriate for inclusion in the Title V permit.

Obsolete condition in RACT Order DSE-414-86:

The following condition was considered obsolete:

"Reynolds agrees to install the specified incineration equipment on No. 1 Laminator by December 31, 1987."

The reason it was considered obsolete was that No. 1 Laminator was installed along with the incinerator; however, since then No. 1 Laminator has been removed from the plant and only the oxidizer remains.

7. **Generally Applicable Requirements** - Certain conditions within existing NSR permits may be applicable to all newly constructed or modified equipment that receive a permit. Below is a listing of these conditions:

1. **Violation of Ambient Air Quality Standard:**
The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I, Condition Nos. 13, 14, and 15 (respectively), of the NSR permits issued on 5/15/02, 8/5/02, and 5/15/02)

2. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.

   b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

   (9 VAC 5-170-160 of State Regulations, Condition No. 16 of the NSR permit issued on 5/30/01)

3. The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training.

   (9 VAC 5-170-160 of State Regulations, Condition 17 of the NSR permit issued on 5/30/01)

4. **Maintenance/Operating Procedures** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

   a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

   b. Maintain an inventory of spare parts.

   c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

   d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

   Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
   (9 VAC 5-50-20 E, Condition Nos. 15 and 16 (respectively), of the NSR permits issued on 8/5/02 and 5/15/02)

5. Permit Suspension/Revocation:

   This permit may be suspended or revoked if the permittee:

   a. Knowingly makes material misstatements in the application for this permit or any amendments to it;

   b. Fails to comply with the conditions of this permit;

   c. Fails to comply with any emission standards applicable to the equipment listed in Condition 2;

   d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;

   e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect on the date that the application for this permit is

permit is submitted;

f. Fails to operate this facility in accordance with the application for this permit or any amendments to it; or

g. Allows the permit to become invalid.

(9 VAC 5-80-10 K, Condition Nos. 14, 16, and 17 (respectively), of the NSR permits issued on 5/15/02, 8/5/02, 5/15/02)

6. This permit may be modified or revoked in whole or in part for cause, including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failute to disclose fully all relevant facts;

c. A change in any condition that requires either a temporary or permanent reduction or elimination of a permitted discharge; or

d. Information that the permitted discharge of any pollutant poses a threat to human health, welfare, or the environment.

(9 VAC 5-20-110 and 9 VAC 5-80-10, Condition No. 8 of the NSR permit issued on 10/29/98)

7. This permit may be modified or revoked in whole or in part for cause, including, but not limited to, the following actions of the permittee:

a. Knowlingly makes a material misstatement in the permit application or any amendments thereto;

b. Fails to comply with the terms or conditions of the permit;

c. Fails to comply with any emission standards applicable to an emissions unit included in the permit;

d. Causes emissions from the stationary source which result in violations of, interfere with the attainment and maintenance of, any ambient air quality standard; or fails to operate in conformance with any applicable control strategy,

strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application is submitted; or

e. Fails to comply with the applicable provisions of VA Reg 9 VAC 5-80-10.

(9 VAC 5-170-160 and 9 VAC 5-80-10, Condition No. 13 of the NSR permit issued on 5/30/01)

8. **Registration/Update** - Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment, and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.1-340 through 2.1-348 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board), and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

(9 VAC 5-170-60, 9 VAC 5-20-160, and Section 120-02-31 Condition Nos. 18, 11, 19, 13, 19 and 16 (respectively) of the NSR permits issued on 8/5/02, 10/29/98, 5/15/02, 5/30/01 and 5/15/02)

9. **Permit Copy** - A copy of this permit shall be maintained on the premises of the facility to which it applies.
(9 VAC 5-170-160 and Section 120-02-11, Condition Nos. 19, 12, 20, 14, 17 and 20 (respectively), of NSR permit issued on 8/5/02, 10/29/98, 5/15/02, 5/15/02 and 5/30/01)

These conditions are being retained in the Title V permit because 1) they are applicable requirements generally applied to all modified and newly constructed equipment permitted through the minor NSR permit program; 2) they have an impact on the prevention of excess emissions and therefore are not environmentally insignificant; and 3) they require recordkeeping and reporting that may be included in periodic monitoring requirements.

Testing

A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements - NA

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-40-130
9 VAC 5-50-130
9 VAC 5-50-320

FUTURE APPLICABLE REQUIREMENTS - NA

INAPPLICABLE REQUIREMENTS

40 CFR 60 NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978.

Reynolds Metals Company – Bellwood Printing Plant's 125,000 gallon storage tank constructed in 1975 (insignificant emission unit ID No. I17) is not applicable to Subpart K of 40 CFR part 60 as the tank stores no. 6 fuel oil of which is not considered a "petroleum liquid" as defined under §60.110(b).

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Un	Emission Unit Descri	Citation	Pollutant(s) Emit (9 VAC 5-80-720	Rated Capacity (9 VAC 5-80-720
I17	Aboveground Storage – AST #17 one 125,000 gallon tar storing #6 fuel oil – constructed in 1975	5-80-720 B. B2	VOC	
I19	One Natural Gas PDC Boiler	5-80-720 C. C2a	Products of combust TSP/PM-10, CO, NO SO_2, VOC	1.5 mmbtu/hr
I20	Hot Water Heater (Ma Ready/Washroom)	5-80-720 C.2a		0.42 Mmbtu/hr
I21	Hot Oil Heater	5-80-720 C 2b		0.57 Btu/hr
I23	Oil/Lubricant Dispens Maintenance Area	5-80-720 C.-C3	VOC	55 gallon drums and smaller
I24	Trim Handling System Balers, Cutters, Extruc	5-80-720 B.-B1	Particulate Matter	
I25	Paint Spray Booth	5-80-720 B. B2	VOC	
I26	Maintenance Dept. Pa Washer (3)	5-80-720 B. B2	VOC	
I27	Oil Water Separator	5-80-720 B. B2	VOC	
I28	Core Cutting	5-80-720 B. B1	PM	
I29	Resin Pellet Conveyin System	5-80-720 B. B1	PM	
I30	Rubber Roll Grinder	5-80-720 B. B1	PM	
I31	Wax Heaters	5-80-720 B. B2	VOC	
I32	Vacuum Cleaning Sys	5-80-720 B. B1	PM	
I33	Hot Air Heater (washr	5-80-720 C. 2A	Products of combust	1.2 mmBTU/hr

			TSP/PM-10, CO, NO SO_2, VOC	
I34	Brown Film Extruder	5-80-720 B. B2	VOC	40 lbs/hr
I35	PDC Eyemark Printer	5-80-720 B. B2	VOC	N/A
I36	PDC Seamer	5-80-720 B. B2	VOC	N/A
I37	Slitters	5-80-720 B. B1	PM	N/A
I38	Gluers	5-80-720 B. B2	VOC	N/A
I39	Carton Cutter Creasers	5-80-720 B. B1	PM	N/A
I40	Washroom Solvent Recovery System	5-80-720 B. B2	VOC	N/A
I41	PDC Wax Laminator	5-80-720 B. B2	VOC	N/A

[1]The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Richmond Times Dispatch from September 28,2007 to October 29, 2007.

No comments were received from the public nor EPA during the public comment period. In addition, no comments were received from EPA during the EPA comment period of which was performed concurrently with the public notice period.